

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL NO. 16-2738 (MAS) (RLS)**

***THIS DOCUMENT RELATES TO ALL CASES***

**CERTIFICATION OF P. LEIGH O'DELL, ESQ.**

P. Leigh O'Dell, ESQ., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs. I submit this Certification based on personal knowledge in support of Plaintiffs' Steering Committee's Opposition to Defendants' Motion to Exclude Dr. John Godleski.

2. Attached hereto as Exhibit 1 is a true and correct copy of Health Canada, "*Screening Assessment Talc*," dated April 2021.

3. Attached hereto as Exhibit 2 is a true and correct copy of "*IARC Monographs, Volume 136, Questions and Answers*," dated July 5, 2024.

4. Attached hereto as Exhibit 3 is a true and correct copy of Dyer, Owen. "Johnson and Johnson recalls its Baby Powder after FDA finds asbestos in sample," *BMJ*, dated October 21, 2019.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Third Supplemental Report (MDL) of William E. Longo, Ph.D., CEO, dated November 17, 2023.

6. Attached hereto as Exhibit 5 is a true and correct copy of Sir Austin Bradford Hill, “The Environment and Disease: Association or Causation?” *Section of Occupational Medicine*, dated January 14, 1965.

7. Attached hereto as Exhibit 6 is a true and correct copy of an Excerpt from Rothman, et al., “Modern Epidemiology,” (3d Ed. 2008).

8. Attached hereto as Exhibit 7 is a true and correct copy of the Third Amended Expert Report of Judith Wolf, MD (MDL), dated May 28, 2024.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Third Amended Expert Report of Daniel L. Clarke-Pearson, MD, dated May 28, 2024.

10. Attached hereto as Exhibit 9 is a true and correct copy of National Cancer Institute. “Ovarian, Fallopian Tube, and Primary Peritoneal Cancers Prevention (PDQ) – Health Professional Version,” dated March 6, 2024.

11. Attached hereto as Exhibit 10 is a true and correct copy of American College of Obstetricians and Gynecologists (ACOG): “Ovarian Cancer FAQs.”

12. Attached hereto as Exhibit 11 is a true and correct copy of ACOG/Society of Gynecologic Oncologists (SGO) Practice Bulletin Hereditary Breast and Ovarian Cancer Syndrome dated September 2017.

13. Attached hereto as Exhibit 12 is a true and correct copy of Savant, Sudha S. “The Role of Inflammation and Inflammatory Mediators in the Development, Progression, Metastasis, and Chemoresistance of Epithelial Ovarian Cancer” dated July 30, 2018.

14. Attached hereto as Exhibit 13 is a true and correct copy of Balkwill, Fran, Mantovani, Alberto. “Inflammation and cancer: back to Virchow?” *The Lancet*, dated February 17, 2001.

15. Attached hereto as Exhibit 14 is a true and correct copy of Shan, Weiwei, Liu, Jinsong. “Inflammation: A hidden path to breaking the spell of ovarian cancer” Dated October 1, 2009.

16. Attached hereto as Exhibit 15 is a true and correct copy of the Third Amended Expert Report of Anne McTiernan, MD, Ph.D., (MDL) dated May 28, 2024.

17. Attached hereto as Exhibit 16 is a true and correct copy of the Expert Report of Patricia G. Moorman, MSPH, PHD (MDL), dated November 16, 2018.

18. Attached hereto as Exhibit 17 is a true and correct copy of the Expert Report of Ellen Blair Smith, MD (MDL) dated November 16, 2018.

19. Attached hereto as Exhibit 18 is a true and correct copy of the Third Amended Expert Report of Jack Siemiatycki, MSc, PhD (MDL), dated May 27, 2024.

20. Attached hereto as Exhibit 19 is a true and correct copy of the Third Amended Expert Report of Rebecca Smith-Bindman, MD (MDL), dated May 28, 2024.

21. Attached hereto as Exhibit 20 is a true and correct copy of the deposition transcript of Shawn Levy, Ph.D., (MDL), dated January 11, 2019.

22. Attached hereto as Exhibit 21 is a true and correct copy of the deposition transcript of Daniel Clarke-Pearson, M.D. (MDL), dated March 8, 2024.

23. Attached hereto as Exhibit 22 is a true and correct copy of Davidson, Ben. “The role of the tumor stroma in ovarian cancer” *Frontiers in Oncology*, dated May 13, 2014.

24. Attached hereto as Exhibit 23 is a true and correct copy of Shin, Ha-Yeon. “Establishment of five immortalized human ovarian surface epithelial cell lines via SV40 T antigen or HPV E6/E7 expression” *PLoS ONE* 13(10), dated June 25, 2018.

25. Attached hereto as Exhibit 24 is a true and correct copy of FDA Response to Citizen’s Petition, dated April 1, 2014.

26. Attached hereto as Exhibit 25 is a true and correct copy of an Excerpt from IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, “Arsenic, Metals, Fibres, and Dusts Volume 100 C, A Review of Human Carcinogens,” (2012).

27. Attached hereto as Exhibit 26 is a true and correct copy of the deposition transcript of Arch I. “Chip” Carson, M.D., Ph.D. (MDL), dated January 19, 2019.

28. Attached hereto as Exhibit 27 is a true and correct copy of the deposition transcript of Judith K. Wolf, M.D. (MDL), dated January 7, 2019.

29. Attached hereto as Exhibit 28 is a true and correct copy of Huncharek, Michael, et al. “Use of cosmetic talc on contraceptive diaphragms and risk of ovarian cancer: a meta-analysis of nine observational studies,” *Euro. J. of Cancer Prev.* (2007).

30. Attached hereto as Exhibit 29 is a true and correct copy of Heller, Debra S., et al. “Asbestos Exposure and Ovarian Fiber Burden.” *American Journal of Industrial Medicine*, (1996).

31. Attached hereto as Exhibit 30 is a true and correct copy of the deposition transcript of Cheryl C. Saenz, M.D. (MDL), dated June 19, 2024.

32. Attached hereto as Exhibit 31 is a true and correct copy of the deposition transcript of Kevin Holcomb, M.D. (MDL), dated March 27, 2019.

33. Attached hereto as Exhibit 32 is a true and correct copy of the deposition transcript of Cheryl Saenz, M.D. (MDL), dated March 13, 2019.

34. Attached hereto as Exhibit 33 is a true and correct copy of an Excerpt from Folkins, Ann K., et al. “Assessing Pelvic Epithelial Cancer Risk and Intercepting Early Malignancy,”

35. Attached hereto as Exhibit 34 is a true and correct copy of Houghton, Serena C., et al. “Perineal Powder Use and Risk of Ovarian Cancer.” *Oxford University Press*, dated September 11, 2014.

36. Attached hereto as Exhibit 35 is a true and correct copy of Langseth, H., et al. “Perineal use of talc and risk of ovarian cancer” *BMJ*, dated May 16, 2017.

37. Attached hereto as Exhibit 36 is a true and correct copy of Henderson, W.J., et al. “The Demonstration of the Migration of Talc from the Vagina and Posterior Uterus to the Ovary in the Rat,” *Env. Res.*, (1986).

38. Attached hereto as Exhibit 37 is a true and correct copy of Jones, Richard E. and Kristen H. Lopez, “Human Reproductive Biology,” 4th Ed. (2006).

39. Attached hereto as Exhibit 38 is a true and correct copy of Kissler, Stefan, et al. “Uterine contractility and directed sperm transport assessed by hysterosalpingoscintigraphy (HSSG) and intrauterine pressure (IUP) measurement,” *Acta Obstet Gynecol Scand.* (2004).

40. Attached hereto as Exhibit 39 is a true and correct copy of Kunz et al., “The Uterine Peristaltic Pump Normal and Impeded Sperm Transport within the Female Genital Tract,” *The Fate of the Male Germ Cell. Plenum Press* (1997).

41. Attached hereto as Exhibit 40 is a true and correct copy of Zervomanolakis et al., “Physiology of Upward Transport in the Human Female Genital Tract,” *Ann. N.Y. Acad. Sci.* (2007).

42. Attached hereto as Exhibit 41 is a true and correct copy of Halme et al., “Retrograde Menstruation in Healthy Women and in Patients with Endometriosis,” *Obst. & Gyn.*, dated August 1984.

43. Attached hereto as Exhibit 42 is a true and correct copy of Blumenkrantz et al., “Retrograde Menstruation in Women Undergoing Chronic Peritoneal Dialysis,” *Obstetrics & Gynecology*, (1981).

44. Attached hereto as Exhibit 43 is a true and correct copy of the deposition transcript of Ellen Blair Smith, M.D., dated January 9, 2019.

45. Attached hereto as Exhibit 44 is a true and correct copy of Sjosten, et al. “Retrograde Migration of Glove Powder in the Human Female Genital Tract”, *Human Reprod.*, dated February 12, 2004.

46. Attached hereto as Exhibit 45 is a true and correct copy of Venter, P.F. and Iturralde, M., “Migration of a Particulate Radioactive Tracer from the Vagina to the Peritoneal Cavity and Ovaries,” *S. Afr. Medi. J.*, dated June 2, 1979.

47. Attached hereto as Exhibit 46 is a true and correct copy of Iturralde, M. and Venter, P.F., “Hysterosalpingo-Radionuclide Scintigraphy (HERS),” *Sem. in Nuc. Med.*, dated October 4, 1981.

48. Attached hereto as Exhibit 47 is a true and correct copy of Egli and Newton, “The Transport of Carbon Particles in the Human Female Reproductive Tract,” *Fert. & Ster.* (1961).

49. Attached hereto as Exhibit 48 is a true and correct copy of Schildkraut, et al., “Association between Body Powder Use and Ovarian Cancer: The African American Cancer Epidemiology Study (AACES),” *Cancer Epidemiol. Biomarkers Prev.*, dated May 12, 2016.

50. Attached hereto as Exhibit 49 is a true and correct copy of Merritt, et al., “Talcum powder, chronic pelvic inflammation and NSAIDs in relation to risk of epithelial ovarian cancer,” *Int. J. Cancer*, (2008).

51. Attached hereto as Exhibit 50 is a true and correct copy of the Third Amended Expert Report of Laura M. Plunkett, PH.D, DABT, dated May 28, 2024.

52. Attached hereto as Exhibit 51 is a true and correct copy of the Expert Report of Arch Carson, MD, PHD (MDL), dated November 16, 2018.

53. Attached hereto as Exhibit 52 is a true and correct copy of the Expert Report of Sonal Singh, MD, MPH, dated November 16, 2018.

54. Attached hereto as Exhibit 53 is a true and correct copy of Gertig, Dorota M., et al. “Prospective Study of Talc Use and Ovarian Cancer,” *J Natl Cancer Inst* (2000).



55. Attached hereto as Exhibit 54 is a true and correct copy of Cramer, et al., “Genital Talc Exposure and Risk of Ovarian Cancer,” *Int. J. Cancer*. (1999).

56. Attached hereto as Exhibit 55 is a true and correct copy of Henderson et al., “Talc and Carcinoma of the Ovary and Cervix,” *The Journal of Obstetrics and Gynaecology*, dated March 1971.

57. Attached hereto as Exhibit 56 is a true and correct copy of Heller, et al., “The relationship between perineal cosmetic talc usage and ovarian talc particle burden,” *Am. J. Obstet. Gynecol.*, dated May 1996.

58. Attached hereto as Exhibit 57 is a true and correct copy of the Expert Report of Sarah E. Kane, MD (MDL), dated November 15, 2018.

59. Attached hereto as Exhibit 58 is a true and correct copy of Mostafa, et al., “Foreign Body Granulomas in Normal Ovaries,” *Obstetrics and Gynecology*, dated November 1985.

60. Attached hereto as Exhibit 59 is a true and correct copy of Cramer, et al., “Presence of Talc in Pelvic Lymph Nodes of a Woman with Ovarian Cancer and Long-Term Genital Exposure to Cosmetic Talc,” *Obstetrics & Gynecology*, dated August 2007.

61. Attached hereto as Exhibit 60 is a true and correct copy of McDonald, et al., “Correlative polarizing light and scanning electron microscopy for the

assessment of talc in pelvic region lymph nodes,” *Ultrastructural Pathology*, dated March 21, 2009.

62. Attached hereto as Exhibit 61 is a true and correct copy of McDonald et al., “Migration of Talc From the Perineum to Multiple Pelvic Organ Sites,” *Am. J. Clin. Pathol.*, dated July 31, 2019.

63. Attached hereto as Exhibit 62 is a true and correct copy of Johnson, KE et al., “Analytic comparison of talc in commercially available baby powder and in pelvic tissues resected from ovarian carcinoma patients.” *Gynecol Oncol.*, dated September 2020.

64. Attached hereto as Exhibit 63 is a true and correct copy of Wehner et al., “Biological effects of cosmetic talc,” *Fd Chem. Toxic.*, dated June 16, 1994.

65. Attached hereto as Exhibit 64 is a true and correct copy of Steffen et al., “Serous Ovarian Cancer Caused by Exposure to Asbestos and Fibrous Talc in Cosmetic Talc Powders – A Case Series,” *JOEM*, dated February 2020.

66. Attached hereto as Exhibit 65 is a true and correct copy of the deposition transcript of Daniel Clarke-Pearson, M.D., dated February 4, 2019.

67. Attached hereto as Exhibit 66 is a true and correct copy of Penninkilampi, Ross and Eslik, Guy D., “Perineal Talc Use and Ovarian Cancer A Systematic Review and Meta-Analysis,” dated January 2018.

68. Attached hereto as Exhibit 67 is a true and correct copy of Mills, Paul K., et al. "Perineal talc exposure and epithelial ovarian cancer risk in the Central Valley of California," *Int'l J. Cancer*, dated June 17, 2004.

69. Attached hereto as Exhibit 68 is a true and correct copy of Wu, et al., "Markers of inflammation and risk of ovarian cancer in Los Angeles County," *Int. J. Cancer*, dated October 21, 2008.

70. Attached hereto as Exhibit 69 is a true and correct copy of Taher, et al., "Systematic Review and Meta-Analysis of the Association between Perineal Use of Talc and Risk of Ovarian Cancer," unpublished (2018).

71. Attached hereto as Exhibit 70 is a true and correct copy of Gates et al., "Talc use, variants of the GSTM1, GSTT1, and NAT2 genes and risk of epithelial ovarian cancer," *Cancer Epidemiol Biomarkers Prev.*, dated September 2008.

72. Attached hereto as Exhibit 71 is a true and correct copy of Coussens, L. and Zena Werb, "Inflammation and Cancer," *Nature*, dated December 19, 2002.

73. Attached hereto as Exhibit 72 is a true and correct copy of Okada, F., "Beyond foreign-body induced carcinogenesis: Impact of reactive oxygen species derived from inflammatory cells in tumorigenic conversion and tumor progressions," *Int. J. Cancer*, dated September 24, 2007.

74. Attached hereto as Exhibit 73 is a true and correct copy of Liou and Storz, "Reactive oxygen species in cancer," *Free Radical Research*, dated May 2010.

75. Attached hereto as Exhibit 74 is a true and correct copy of Grivennikov, et al., "Immunity, Inflammation, and Cancer," *Cell*, dated March 19, 2010.

76. Attached hereto as Exhibit 75 is a true and correct copy of Crusz and Balkwill, "Inflammation and cancer: advances and new agents," *Nature*, dated June 30, 2015.

77. Attached hereto as Exhibit 76 is a true and correct copy of Reuter, et al., "Oxidative stress, inflammation, and cancer: How are they linked?" *Free Radic Biol Med.*, dated December 1, 2010.

78. Attached hereto as Exhibit 77 is a true and correct copy of Kiraly, et al., "Inflammation-Induced Cell Proliferation Potentiates DNA Damage-Induced Mutations In Vivo., dated February 3, 2015.

79. Attached hereto as Exhibit 78 is a true and correct copy of Trabert, et al., "Pre-diagnostic levels of inflammation markers and risk of ovarian cancer in the Prostate, Lung, Colorectal and Ovarian Cancer (PLCO) Screening Trial," *Gynecol Oncol.*, dated November 2014.

80. Attached hereto as Exhibit 79 is a true and correct copy of National Academic of Sciences, Engineering, and Medicine, Ovarian cancers: Evolving

paradigms in research and care, (IOM) Washington DC: *The National Academic Press*, (2016).

81. Attached hereto as Exhibit 80 is a true and correct copy of Fernandes et al., “The Role of the Mediators of Inflammation in Cancer Development,” *Pathol. Oncol. Res.*, dated March 5, 2015.

82. Attached hereto as Exhibit 81 is a true and correct copy of the Second Amended Expert Report of Shawn Levy, PHD (MDL), dated May 28, 2024.

83. Attached hereto as Exhibit 82 is a true and correct copy of Yan et al., “Molecular analysis of genetic instability,” *Cancer* 512: 15-28, at p. 16 (2006).

84. Attached hereto as Exhibit 83 is a true and correct copy of Hanahan, D. and Robert A. Weinberg, “Hallmarks of Cancer: The Next Generation,” *Cell* 144: 646-674, at p. 659 (2011).

85. Attached hereto as Exhibit 84 is a true and correct copy of Ness, Roberta and Carrie Cottreau, “Possible Role of Ovarian Epithelial Inflammation in Ovarian Cancer” *Journal of the National Cancer Institute*, Vol. 91, No. 17, September 1, 1999.

86. Attached hereto as Exhibit 85 is a true and correct copy of Sept. 30, 2004 Fax from Luzenac Director of Product Safety to Bill Ashton from JNJ.

87. Attached hereto as Exhibit 86 is a true and correct copy of Saed et al., “Updates on the role of oxidative stress in the pathogenesis of ovarian cancer,” *Gynecologic Oncology* 145: 595-602, at p. 596-97 (2017).

88. Attached hereto as Exhibit 87 is a true and correct copy of Saed, Morris and Fletcher (2018), “New Insights into the Pathogenesis of Ovarian Cancer: Oxidative Stress,” *Ovarian Cancer – From Pathogenesis to Treatment* Chapter 4.

89. Attached hereto as Exhibit 88 is a true and correct copy of Freedman et al., “Peritoneal inflammation – A microenvironment for Epithelial Ovarian Cancer (EOC),” *J. of Translational Med.* 2: 1-10, at p. 4 (2004).

90. Attached hereto as Exhibit 89 is a true and correct copy of Jiang, Z., Nicole M. Fletcher, Rhoubia Ali-Fehmi, Michael P. Diamond, Husam M. Abu-Soud, Adnan R. Munkarah, and Ghassan M. Saed, “Modulation of redox signaling promotes apoptosis in epithelial ovarian cancer cells,” *Gynecol Oncol.* 122(2): 1-17, at p. 8 (2011).

91. Attached hereto as Exhibit 90 is a true and correct copy of Belotte et al. 2014, “The Role of Oxidative Stress in the Development of Cisplatin Resistance in Epithelial Ovarian Cancer,” *Reproductive Sciences* 21(4): 503-508, at p. 505-506 (2014).

92. Attached hereto as Exhibit 91 is a true and correct copy of Fletcher, N., Zhonglian Jiang, Rhoubia Ali-Fehmi, Nancy K. Levin, Jimmy Belotte, Michael A.

Tainsky, Michael P. Diamond, Hasam M. Abu-Soud, and Ghassan M. Saed, “Myeloperoxidase and free iron levels: Potential biomarkers for early detection and prognosis of ovarian cancer,” *Cancer Biomarkers* 10:267-275, at p. 268 (2011).

93. Attached hereto as Exhibit 92 is a true and correct copy of Saed et al., “Myeloperoxidase serves as a redox switch that regulates apoptosis in epithelial ovarian cancer,” *Gynecol Onco.* 116(2): 1-14, at p. 6 (2010).

94. Attached hereto as Exhibit 93 is a true and correct copy of Reid et al., “Gynecologic and Breast Cancers in Women After Exposure to Blue Asbestos in Wittenoom,” *Cancer Epidemiology, Biomarkers & Prevention* 18: 140-147 (2009).

95. Attached hereto as Exhibit 94 is a true and correct copy of Radic et al., “Immunosuppression induced by talc granulomatosis in the rat,” *Clin. Exp. Immunol.* 73: 316-321 (1988).

96. Attached hereto as Exhibit 95 is a true and correct copy of “Toxicology and Carcinogenesis Studies of Talc,” U.S. Dept. of Health and Human Servs., No. 421 at pp. 11, 56 (1993).

97. Attached hereto as Exhibit 96 is a true and correct copy of Keskin et al. (2009) “Does long-term talc exposure have a carcinogenic effect on the female genital system of rats? An experimental pilot study.”

98. Attached hereto as Exhibit 97 is a true and correct copy of Kahn et al., “Nano-talc Stabilized TNF-  $\alpha$ -mRNA in Human Macrophages,” *J of Biomedical Nanotechnology* 7: 112-113, at p.113 (2011).

99. Attached hereto as Exhibit 98 is a true and correct copy of Ghio et al., “Disruption of Iron Homeostasis in Mesothelial Cells after Talc Pleurodesis,” *Am J Respi Cell Mol Biol* 46: 80-86, at p. 80 (2012).

100. Attached hereto as Exhibit 99 is a true and correct copy of Akhtar et al., “Cytotoxicity and Apoptosis Induction by Nanoscale Talc Particles from Two Different Geographical Regions in Human Lung Epithelial Cells,” *Environmental Tox* 394-406, at p. 404 (2014).

101. Attached hereto as Exhibit 100 is a true and correct copy of Shukla, Arti, Maximilian B. MacPherson, Jedd Hillegass, Maria E. Ramos-Nino, Vlada Alexeeva, Pamela M. Vacek, Jeffrey P. Bond, Harvey I. Pass, Chad Steele, and Brooke T. Mossman, “Alterations in Gene Expression in Human Mesothelial Cells Correlate with Mineral Pathogenicity,” *American Journal of Respiratory Cell and Molecular Biology* 41:114-123 (2009).

102. Attached hereto as Exhibit 101 is a true and correct copy of Buz’Zard and Lau, “Pycnogenol reduces Talc-induced Neoplastic Transformation in Human Ovarian Cell Cultures,” *Phytother. Res.* 21: 579-586, at p. 585 (2007).



103. Attached hereto as Exhibit 102 is a true and correct copy of Akhtar, Mohd Javed, Sudhir Kumar, Ramesh Chandra Murthy, Mohd Ashquin, Mohd Imran Khan, Govil Patil, and Iqbal Ahmad. “The Primary Role of Iron-Mediated Lipid Peroxidation in the Differential Cytotoxicity Caused by Two Varieties of Talc Nanoparticles on A549 Cells and Lipid Peroxidation Inhibitory Effect Exerted by Ascorbic Acid.” *Toxicology in Vitro: An International Journal Published in Association with BIBRA* 24, no. 4 (June 2010): 1139–47.

104. Attached hereto as Exhibit 103 is a true and correct copy of Fletcher, NM, Amy K. Harper, MD, Ira Memaj, BS, Rong Fan, MS, Robert T. Morris, MD, and Ghassan M. Saed, PhD. “Molecular Basis Supporting the Association of Talcum Powder Use With Increased Risk of Ovarian Cancer.” *Reproductive Sciences* 1-10. (2019).

105. Attached hereto as Exhibit 104 is a true and correct copy of Harper et al., “Talcum Powder Induces Malignant Transformation in Normal Human Primary Ovarian Epithelial Cells,” *Minerva Obstet. Gynecol.* 75:150-157 (2023).

106. Attached hereto as Exhibit 105 is a true and correct copy of Mandarino et al., “The effect of talc particles on phagocytes in co-culture with ovarian cancer cells,” *Environ Res.* 180 (2020).

107. Attached hereto as Exhibit 106 is a true and correct copy of Emi et al., “Transcriptomic and epigenomic effects of insoluble particles on J774 macrophages,” *Epigenetics* 16:1053-1070 (2021).

108. Attached hereto as Exhibit 107 is a true and correct copy of Roberts et al., “Management of a malignant pleural effusion: British Thoracic Society pleural disease guideline 2010,” *Thorax* 65:32-40 (2010).

109. Attached hereto as Exhibit 108 is a true and correct copy of Genofre et al., “Talc pleurodesis: Evidence of systemic Inflammatory response to small size talc particles,” *Respiratory Medicine*, 103:91-97 (2009).

110. Attached hereto as Exhibit 109 is a true and correct copy of Vannucci et al., “Observational analysis on inflammatory reaction to talc pleurodesis: Small and large animal model series review,” *Experimental and Therapeutic Medicine*, 15:733-738 (2018).

111. Attached hereto as Exhibit 110 is a true and correct copy of Ghio, Correspondence “Talc Should Not Be Used for Pleurodesis in Patients with Nonmalignant Pleural Effusions,” (2001).

112. Attached hereto as Exhibit 111 is a true and correct copy of Ferrer et al., “Influence of Particle Size on Extrapleural Talc Dissemination After Talc Slurry Pleurodesis,” *Chest*, 122:1018-1027 (2002).

113. Attached hereto as Exhibit 112 is a true and correct copy of Trabert et al., “Aspirin, Nonaspirin Nonsteroidal Anti-inflammatory Drug, and Acetaminophen Use and Risk of Invasive Epithelial Ovarian Cancer: A Pooled Analysis in the Ovarian Cancer Association Consortium,” *JNCI J Natl Cancer Inst.* 106(2): 1-11, at p. 1 (2014).

114. Attached hereto as Exhibit 113 is a true and correct copy of Trabert et al., “Analgesic Use and Ovarian Cancer Risk: An Analysis in the Ovarian Cancer Cohort Consortium,” *J Nat Cancer Inst.* 111(2): 1-9, at p. 8 (2019).

115. Attached hereto as Exhibit 114 is a true and correct copy of Peres et al., “Analgesic medication use and risk of epithelial ovarian cancer in African American women,” *British J. of Cancer* 114: 819-825 (2016).

116. Attached hereto as Exhibit 115 is a true and correct copy of Hurwitz et al. (2022) *J Clin Oncol* Published by American Society of Clinical Oncology.

117. Attached hereto as Exhibit 116 is a true and correct copy of Phung et al., “Effects of risk factors for ovarian cancer in women with and without endometriosis,” *Fertil Steril* 118:960-969 (2022).

118. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell

P. LEIGH O'DELL

Dated: August 22, 2024